

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GENERAL ACCESS SOLUTIONS, LTD.,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS, VERIZON SERVICES CORP., VERIZON BUSINESS GLOBAL LLC, VERIZON BUSINESS NETWORK SERVICES LLC, VERIZON CORPORATE SERVICES GROUP INC., VERIZON DATA SERVICES LLC, and VERIZON ONLINE LLC,

Defendants,

ERICSSON, INC.,

Intervenor-Defendant.

Case No. 2:22-cv-00394 JRG

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND A NOTICE OF SETTLEMENT

Pursuant to this Court's Standing Order Regarding Proper Notification of Settlement to the Court, Plaintiff, General Access Solutions, Ltd. ("General Access") and Defendants, Cellco Partnership d/b/a Verizon Wireless, Verizon Services Corp., Verizon Business Global LLC, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., Verizon Data Services LLC, and Verizon Online LLC (collectively, "Verizon") and Intervenor-Defendant, Ericsson, Inc. (collectively, "Defendants") (the "Parties") jointly notify the Court that all matters in controversy between the Parties have settled in principle via a binding term sheet and jointly move for entry of an Order staying the above-captioned case for a period of thirty (30) days to allow the Parties to complete the settlement process. The Parties will file a stipulation of dismissal with prejudice under Federal Rule of Civil Procedure 41(a)(1)(A)(ii) once the settlement process is complete.

Dated: December 8, 2024

Respectfully submitted,

By: /s/ DRAFT w/ permission Andrea Fair
Glen E. Summers (CO Bar No. 30635)
LEAD ATTORNEY
Nosson D. Knobloch (CO Bar No. 42134)
Giovanni J. Sanchez* (DC Bar No. 1672099)
*Not yet admitted to practice in Colorado
BARTLIT BECK LLP
1801 Wewatta Street, Suite 1200
Denver, CO 80202
Telephone: (303) 592-3100
glen.summers@bartlitbeck.com
nosson.knobloch@bartlitbeck.com
sten.jernudd@bartlitbeck.com
giovanni.sanchez@bartlitbeck.com

Michael J. Valaik (IL Bar No. 6276086)
BARTLIT BECK LLP
54 West Hubbard Street, Suite 300
Chicago, IL 60654
Telephone: (312) 494-4400
michael.valaik@bartlitbeck.com

Of counsel:
T. John Ward, Jr. (TX Bar No. 00794818)
Charles Everingham IV (TX Bar No. 00787447)
Andrea L. Fair (TX Bar No. 24078488)
WARD, SMITH & HILL, PLLC
1507 Bill Owens Pkwy.
Longview, TX 75604
Telephone: (903) 757-6400
jw@wsfirm.com
ce@wsfirm.com
andrea@wsfirm.com

Attorneys for Plaintiff General Access Solutions, Ltd.

/s/ Brian A. Rosenthal w/ permission Andrea Fair
Katherine Q. Dominguez (NY Bar No. 4741237)
LEAD ATTORNEY
kdominguez@gibsondunn.com
Josh A. Krevitt (NY Bar No. 2568228)
jkrevitt@gibsondunn.com
Brian A. Rosenthal (NY Bar No. 3961380)
brosenthal@gibsondunn.com
Sung Bin Lee (NY Bar No. 5701099)

slee3@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: (212) 351-4000

Jaysen S. Chung (CA Bar No. 280708)
jschung@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street
San Francisco, CA 94105-0921
Telephone: (415) 393-8271

Andrew W. Robb (CA Bar No. 291438)
arobb@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
1881 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 849-5334

Ashbey N. Morgan (TX Bar No. 24106339)
anmorgan@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
2001 Ross Avenue, Suite 2100
Dallas, TX 75201
Telephone: (214) 698-3112

Deron R. Dacus (TX Bar No. 00790553)
ddacus@dacusfirm.com
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, Texas 75701
Telephone: (903) 705-1117

Attorneys for Defendants Celco Partnership d/b/a Verizon Wireless, Verizon Services Corp., Verizon Business Global LLC, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., Verizon Data Services LLC, and Verizon Online LLC (collectively, "Verizon")

/s/ Douglas M. Kubehl w/ permission Andrea Fair
Douglas M. Kubehl (TX Bar No. 00796909)
doug.kubehl@bakerbotts.com
Jeffery S. Becker (TX Bar No. 24069354)
jeff.becker@bakerbotts.com
Melissa L. Muenks (TX Bar No. 24097442)
melissa.muenks@bakerbotts.com

BAKER BOTTS L.L.P.
2001 Ross Avenue
Dallas, TX 75201
Telephone: (214) 953-6500
Facsimile: (214) 953-6503

Attorneys for Intervenor-Defendant Ericsson, Inc.

CERTIFICATE OF SERVICE

Pursuant to Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that a copy of the foregoing document was served via ECF to all counsel of record.

/s/ Andrea Fair
Andrea Fair

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies pursuant to Local Rule CV-7(h) that the relief requested in this motion is jointly requested.

/s/ Andrea Fair
Andrea Fair